

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Case Number 15-cv-2210 PJS/BT**

RONALDO LIGONS,
BARRY MICHAELSON,
JOHN ROE, and JANE ROE,
JOHN MILES AND JANE MILES,
JOHN STILES AND JANE STILES,
individually, and on behalf of those similarly situated,

File No. 15-CV-2210, PJS/BT

Plaintiffs,

v.

MINNESOTA DEPARTMENT OF CORRECTIONS,

THOMAS ROY,
Minnesota Commissioner of Corrections,
in his official capacity,

DR. DAVID A. PAULSON, M.D.,
in his individual and his official capacities for actions
under color of law as Medical Director,
Minnesota Department of Corrections,

NANETTE LARSON,
in her individual and her official capacities
for actions under color of law as Health Services Director,
Minnesota Department of Corrections,

Dr. D. QUIRAM, M.D.,
in his individual and his official capacities for
actions under color of law as Plaintiffs' treating physician
at Minnesota Correctional Facility, Stillwater,

JOHN and JANE DOES A - J,
in their respective individual and official capacities
for actions under color of law as staff of
Minnesota Correctional Facilities, Stillwater and Faribault,

and

CENTURION OF MINNESOTA, L.L.C.,

Defendants.

PLAINTIFFS' FED. R. CIV. P. 26(a)(2) DISCLOSURES -- AMENDED

Plaintiffs jointly submit the following in according with Fed. R. Civ. P. 26(a)(2).

1. Bennett Cecil, M.D., board certified gastroenterologist who specializes in the diagnosis and treatment of Hepatitis-C at the following location:
Hepatitis-C. Treatment Centers,
1009A DuPont Square,
Louisville, KY 40207.
Phone: 502-894-9950/502-894-9991 (fax);
provided expert affidavit in support of Plaintiffs per Fed. R. Civ. P. 26(a)(2) (ECF 36)
2. Mark Gordon, M.D., board certified gastroenterologist who specializes in the diagnosis and treatment of blood-borne disease, including Hepatitis-C, at the following location:
One McKnight Place, Suite 437, St. Louis, MO 53124-2014
203.507.5551/314.991.6656(!)/martin.gordon@yale.edu;
provided expert affidavit in support of Plaintiffs per Fed. R. Civ. P. 26(a)(2) (ECF 37)
3. Dr. Julie Thompson, M.D.,
University of Minnesota Medical Center, Hepatology Clinic,
516 Delaware St. SE,
Minneapolis, MN 55455,
thom0235@umn.edu,
tel. 612.626.6100
PLAINTIFFS' EXPECTED FED. R. CIV. P. 26(a)(2) and Fed. R. Evid. 701-704
expert witness as to the treatment of plaintiffs' cases of hepatitis C
4. Dr. Greg Filice, M.D.,
VA Medical Center
1 Veterans Drive
Minneapolis, MN 55419
612.725.2000;
infectious disease specialist employed at the Veteran's Administration Hospital in Minneapolis and a member of IDSA. He will testify on the VA adoption of the HCV Guidance Panel standard-of-care for the treatment of HCV and his professional opinion regarding the DOC/Centurion contract that required the Twin Cities community standard of care for the treatment of HIV, but not for the treatment of HCV.

Date: 21 September 2016

Respectfully submitted:

PETER J. NICKITAS LAW OFFICE, L.L.C.

/s/ *Peter J. Nickitas*

Peter J. Nickitas, MN Att'y #212313

(ELECTRONICALLY SIGNED)

Attorney for the Plaintiffs

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